

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

12 Civ. 6421 (KMK)

v.

EDWARD BRONSON, E-LIONHEART  
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL,

Defendants,

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**AFFIDAVIT OF EDWARD BRONSON**

STATE OF NEW YORK            )  
  ) SS:  
COUNTY OF WESTCHESTER    )

Edward Bronson, duly sworn, deposes and says:

1. I am a defendant in the above caption action and am fully familiar with the facts and circumstances set forth herein.
2. I submit this affidavit in response to the Court's inquiry regarding the timing of the good faith payment made January 29, 2021.
3. On January 19, 2021, this Court issued an Order in this case [Docket No. 223] which, *inter alia*, directed me to make a 'good faith' payment of \$25,000.00 to the Securities and

Exchange Commission (the “SEC”) within a week after entry of the Order and to produce certain documents to the SEC within two weeks of the Order. (Order, p. 30).

4. When I first read the Order, I mistakenly thought I had two weeks to make the good faith payment and did not work as diligently as I should have done to gather the funds.

5. When the SEC’s counsel contacted my counsel on January 27, 2021, inquiring whether the payment was made, I asked for an allowance to make the payment on Monday, February 1, 2021. I also asked the proper address to send the payments.

6. SEC’s counsel did not grant my request to pay on February 1 and instructed me to make payments pursuant to the instructions located at <https://www.sec.gov/paymentoptions>.

7. On January 28, 2021, this Court issued a supplemental Order [Docket No. 225] directing that I make the good faith payment by 5 pm, January 29, 2021.

8. On the morning of January 29, 2021, I made the good faith payment to the SEC by sending a check in the amount of \$25,000.00 via Federal Express to the address stated in the SEC’s payment instructions:

Enterprise Service Center  
Accounts Receivable Branch  
6500 S McArthur Blvd  
HQ Bldg Room 181 AMZ-341  
Oklahoma City, OK 73169

Proof of the payment was filed on the docket at 11:38 am [Docket No. 226].

9. Regarding the production of documents, the January 19, 2021 Order, it directs me to respond to all discovery demands of the SEC.

10. Both before and after the SEC filed its contempt motion, I had provided numerous documents to the SEC, including documents regarding all bank accounts and assets of V2IP, Inc.

11. To the best of my knowledge, there are currently no unsatisfied document requests from the SEC. I am ready and willing to respond to any further document requests of the SEC.

12. Finally, my wife and I are cooperating with the SEC regarding our depositions, which the SEC has scheduled for later this month.



Edward Bronson  
February 1, 2021

Paul A. Rachmuth  
Notary Public State of New York  
Nassau County  
Lic # 02546327340  
Commission Expires 10/11/23

VIA VIDEO CONFERENCE  
TO EXECUTIVE ORDER NO. 202-78